

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN F. VODOPIA,

Plaintiff,

v.

KONINKLIJKE PHILLIPS
ELECTRONICS N.V., *et al*

Defendant.

Hon. Barbara S. Jones, U.S.D.J.

Case No.: 07-6214

Civil Action

**NOTICE OF MOTION TO ADMIT
ROBERT C. PETRULIS, ESQ. *PRO*
HAC VICE PURSUANT TO LOCAL
RULE 1.3**

TO: Raymond Nardo, Esq.
129 Third Street
Mineola, NY 11501
Attorney for Plaintiff, John F. Vodopia

COUNSEL:

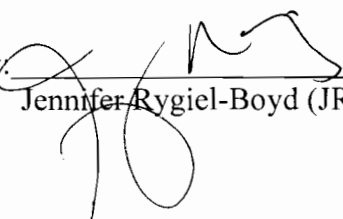
PLEASE TAKE NOTICE that on a date to be scheduled by the United States District Court for the Southern District of New York, defendants Phillips Electronics North America Corporation and Koninklijke Philips Electronics N.V. shall move before The Barbara S. Jones, U.S.D.J., for an Order admitting Robert C. Petrulis, Esq. as a visiting attorney *pro hac vice* to participate in all proceedings relative to the above-captioned matter.

FILED
U.S. DISTRICT COURT
2007 OCT -3 PM 3:45
S.D. OF N.Y.

625648 SC \$ 8173869

PLEASE TAKE FURTHER NOTICE that in support of this application Defendant shall rely upon the accompanying Affidavits of Robert C. Petrulis, Esq. and Jennifer Rygiel-Boyd, Esq. A proposed form of Order is being concurrently submitted.

Plaintiff's attorney consents to this motion.

By:  _____
Jennifer Rygiel-Boyd (JR 5676)

Dated: September 26, 2007

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN F. VODOPIA,

Plaintiffs,

VS.

KONINKLIJKE PHILLIPS
ELECTRONICS N.V. *et al.*

Defendant.

Case No. 07-6214

Honorable Barbara S. Jones, U.S.D.J.

Civil Action

**AFFIDAVIT OF
JENNIFER RYGIEL-BOYD, ESQ. IN
SUPPORT OF MOTION TO ADMIT
ROBERT C. PETRULIS, ESQ.
*PRO HAC VICE***

JENNIFER RYGIEL-BOYD, ESQ., being of full age, avers and states as follows:

1. I am an attorney-at-law and an associate of the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., attorneys for defendants Phillips Electronics North America Corporation and Koninklijke Philips Electronics N.V. (hereinafter collectively referred to as “Defendants”)

2. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Robert C. Petrulis, Esq. as counsel *pro hac vice* pursuant to Local Rule 1.3.

3. I am a member in good standing of the bar of the State of New York since 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

4. I know Robert C. Petrulis, Esq., who is a Shareholder with my law firm's office located in Cleveland, Ohio.

5. I have found Mr. Petrulis to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Robert C. Petrulis, Esq. *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Robert C. Petrulis, Esq. *pro hac vice* which is attached hereto as *Exhibit A*.

I hereby aver that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Sworn to and subscribed
before me this 26th day September
of 2007.

Ava Armstrong
Notary Public

Jennifer Rygiel-Boyd

AVA ARMSTRONG
Notary Public
State of New Jersey
My Commission Expires June 25, 2008

Robert C. Petrulis, Esq. (#0040947)
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
127 Public Square, Suite 4130
Cleveland, Ohio 44114
Telephone: (216) 357-4735

Attorneys for Defendants
Philips Electronics North America Corp. and
Koninklijke Philips Electronics N.V.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN F. VODOPIA,)	CASE NO. 1:07CV06214
)	
Plaintiff,)	JUDGE BARBARA S. JONES
)	
vs.)	MAGISTRATE JUDGE DEBRA C. FREEMAN
)	
)	
KONINKLIJKE PHILIPS ELECTRONICS)	
N.V., <i>et al.</i> ,)	AFFIDAVIT OF ROBERT C. PETRULIS,
)	ESQ. IN SUPPORT OF MOTION FOR
Defendants.)	ADMISSION <i>PRO HAC VICE</i>

ROBERT C. PETRULIS, ESQ., being of full age, avers and states as follows:

1. I am a Shareholder at the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I submit this Affidavit in support of my application for permission to appear pro hac vice on behalf of defendants Philips Electronics North America Corporation and Koninklijke Philips Electronics N.V.

2. I represent Philips Electronics North America Corporation and Koninklijke Philips Electronics N.V in the above-captioned matter along with Kristin Ulrich Somich with the law firm of Ogletree Deakins, Nash, Smoak & Stewart, P.C., and Jennifer

Rygiel-Boyd, an Associate with the firm of Ogletree Deakins, Nash, Smoak & Stewart, P.C. and a member in good standing of the bar of this Court.

3. This is a retaliation and wrongful termination case. Philips has requested that I represent them in this matter because of my prior handling of similar matters, my representation of Philips in other employment discrimination lawsuits and my general experience in employment law.

4. I received my law degree from the University of Michigan, May 14, 1988.

5. I am a member in good standing of the bar of the State of Ohio and I am admitted to practice before all levels of Ohio state courts. (*See Exhibit A.*)

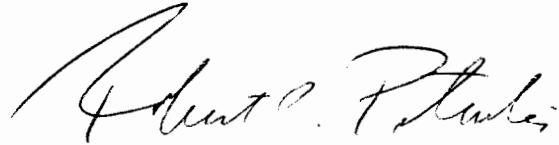
6. I am also admitted and a member in good standing of the United States District Court for the Northern District of Ohio, as well as the 6th Circuit Court of Appeals and United States Supreme Court.

7. I am not under suspension, disbarment, or any other discipline or disciplinary procedure of any Court.

8. If admitted *pro hac vice*, I will conduct myself as an attorney of this Court uprightly and according to the law, and I will support and defend the Constitution of the United States.

9. Accordingly, for the foregoing reasons, I respectfully request to be admitted as a visiting attorney *pro hac vice* to participate in all proceedings relative to the above-captioned matter.

I hereby aver that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Robert C. Petrulis, Esq.

Sworn to and subscribed

before me this 20th day of September 2007.

Notary Public



5208005.1 (OGLETREE)

K. ELLEN TOTH, ESQ.
NOTARY PUBLIC • STATE OF OHIO
My Commission Expires No Expiration Date
Section 14703.0 RC

The Supreme Court of Ohio

C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Robert Charles Petrulis

was admitted to the practice of law in Ohio on November 07, 1988; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 18th day of September, 2007.

SUSAN B. CHRISTOFF
Director, Attorney Services Division

Rui Moore
Attorney Registration Assistant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOHN F. VODOPIA,

Plaintiff,

v.

KONINKLIJKE PHILLIPS
ELECTRONICS N.V., *et al*

Defendant.

: Hon. Barbara S. Jones, U.S.D.J.
:
:

: Case No.: 07-6214
:
:

: *Civil Action*
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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2007, the following documents:

NOTICE OF MOTION TO ADMIT ROBERT C. PETRULIS, ESQ. *PRO HAC VICE*

**AFFDAVIT OF JENNIFER RYGIEL-BOYD, ESQ. IN SUPPORT OF MOTION
TO ADMIT ROBERT C. PETRULIS, ESQ. *PRO HAC VICE***

**AFFDAVIT OF ROBERT C. PETRULIS, ESQ. IN SUPPORT OF MOTION
FOR ADMISSION *PRO HAC VICE***

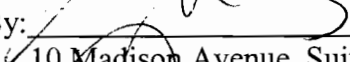
were filed with the Clerk of the Court in accordance with the Federal Rules of Civil Procedure, and/or the Southern District of New York's Local Rules and/or Rules on Electronic Service. The above listed documents are available for viewing downloading from the ECF system.

Additionally, I caused a copy of the above listed documents to be served, via Federal Express, upon Raymond Nardo, Esq., 129 Third Street, Mineola, NY 11501, attorney for plaintiff.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
Attorneys for Defendant
Koninklijke Phillips Electronics N.V.

Date: September 27, 2007

By:  (JR 5676)
10 Madison Avenue, Suite 402
Morristown, New Jersey
Tel: (973) 656-1600
jennifer.rygiel-boyd@ogletreedeakins.com

4592414.1 (OGLETREE)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN F. VODOPIA,

Plaintiff,

v.

KONINKLIJKE PHILLIPS
ELECTRONICS N.V. *et al*

Defendant.

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Hon. Barbara S. Jones, U.S.D.J.
Case No.: 07-6214

Civil Action

**ORDER ADMITTING
ROBERT C. PETRULIS, ESQ. *PRO*
HAC VICE PURSUANT TO LOCAL
RULE 1.3**

THIS MATTER, having come before the Court upon the application of Defendant for an
Order pursuant to Local Rule 1.3;

IT IS on this _____ day of _____ 2007

ORDERED that Robert C. Petrulis, Esq., in good standing, be admitted as a visiting
attorney, *pro hac vice*, to participate in all proceedings relative to the above-captioned matter.

Hon. Barbara S. Jones U.S.D.J.